

# Review of Previous Permits

NSR Retooling Team  
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# Approach

- Examine NSR Major and Synthetic Minor Permits Issued in 2002 - 24 permits
- Compare Project Description with Major components of Federal NSR rule changes
- Examine control requirements of permit based upon BACT/LAER with next most stringent regulatory requirement (NSPS, MACT, RACT, etc.)

# Types of sources

- Printing facilities
- Paper mills
- Power plants
- Generators
- Foundries
- Boilers

# Programs Providing Exemption

- Applicability Test
- PALs
- Debottlenecking
- Clean Units
- PCP

# Examples

- Printing Facility
  - BACT Control
  - RACT Applies
  - PAL Possibilities
- Difference of 78 TPY

# Examples

- Paper Machine Changes
- Synthetic Minor - Netted
- Applicability Test
- Cap with 85% vs. 85% Control no cap
- 330 Tons VOC

# Examples

- Foundry
- Disa Line
- PAL
- BACT vs. NR 415
- 266 ton difference

# Examples

- Power Plant
- Burner change
- Applicability Test
- BACT vs. NSPS
- 771 ton increase



# Examples

- Paper Machine
- Debottlenecking
- No Control Required

# Examples

- Wood Fired Boiler Upgrade
- Particulate
- BACT vs. NSPS
- Applicability Test
- 675 ton